

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHANEL, INC.,

Plaintiff,

v.

WHAT COMES AROUND GOES AROUND  
LLC d/b/a WHAT GOES AROUND COMES  
AROUND, MHW PROPERTIES, INC., PINES  
VINTAGE, INC., VINTAGE DESIGNS LTD.,  
WCAGA LA, LLC, and individuals SETH  
WEISSER and GERARD MAIONE,




Defendants.




Civil Action No. 18-cv-2253-LLS




**AMENDED CERTIFICATION OF ROBIN GRUBER PURSUANT TO  
THE COURT’S AUGUST 21, 2020 DISCOVERY ORDER [DKT.  
NO. 146]**




I, Robin Gruber, declare as follows:

1. I am Associate General Counsel, Global Head of Anti-Diversion for Plaintiff Chanel, Inc. (“Chanel”). I am also an officer of Chanel. When my deposition was taken on October 1, 2020, I was not sure of my status as an officer given the corporate structure of Chanel, but I have now confirmed my status as an officer, and therefore make this Amended Certification.
2. Pursuant to the Court’s August 21, 2020 Order (Dkt. No. 146), and based on my knowledge, I hereby certify that Chanel has admissible evidence that the items sold or offered for sale by Defendant WGACA, LLC (“WGACA”) that are listed in the below chart were not made in a factory which made genuine Chanel products, but are so close to copies that they are substantially indistinguishable from the genuine articles.

No.	WGACA SKU No.	Chanel Serial No.	WGACA Item Description	Actual Chanel Item Description	Evidence Of Counterfeit Nature	Date Of Purchase / Sold	Image
1.	Q6B01Z1IR9000	17688191	Chanel Red Lambskin E/W Mini	None / Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1013 Exhibit 1014 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	Feb. 4, 2015	
2.	Q6BAQP0FI4018	17688004	Chanel Beige CVR Newclsc Jumbo	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	March 6, 2018	
3.	Q6B01A3PK5003	17688283	Chanel Blk Clf Boy Bag New Med	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	Aug. 5, 2019	

No.	WGACA SKU No.	Chanel Serial No.	WGACA Item Description	Actual Chanel Item Description	Evidence Of Counterfeit Nature	Date Of Purchase / Sold	Image
4.	Q6B01A1IK7008	17690211	Chanel Black Lambskin Boy Med	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 Exhibit 1064 WGACA_00029011_REDAC TED	Dec. 20, 2019	
5.	Q6B0WW0FKB197	17703597	Chanel Black Caviar Gts	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	July 19, 2019	
6.	Q6BBJY11M7002	17706404	Chanel Mlti Lamb Graphicflap M	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	Jan. 27, 2020	

No.	WGACA SKU No.	Chanel Serial No.	WGACA Item Description	Actual Chanel Item Description	Evidence Of Counterfeit Nature	Date Of Purchase / Sold	Image
7.	Q6B0WW0FKB22	17710109	Chanel Black Caviar Gst	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	May 26, 2020	
8.	Q6B0100FK4000	17711485	Chanel Black Caviar 2.55 Jumbo	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	Nov. 24, 2014	
9.	Q6B0100FK4001	17714417	Chanel Blk Caviar 2.55 Jumbo	None /Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1017 Exhibit 1018 Exhibit 1019 Exhibit 1063 WGACA_00029011_REDAC TED	Oct. 22, 2015	

No.	WGACA SKU No.	Chanel Serial No.	WGACA Item Description	Actual Chanel Item Description	Evidence Of Counterfeit Nature	Date Of Purchase / Sold	Image
10.	Q6BBJY1IM7000	17714847	Chanel Mlt Lamb Graphic Flap M	None / Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 27 Exhibit 72 Exhibit 1010 Exhibit 1016 Exhibit 1063 WGACA_00029011_REDAC TED	Oct. 14, 2016	
11.	Q6B0593PR0000	17703424	Chanel Red Calf 2013 Shldr 10"	None / Serial Number voided based on theft of such Serial Number from one of Chanel's authorized factories in Italy	Exhibit 1016 Exhibit 72 WGACA_00029674 WGACA_00029011_REDAC TED e catalog -17703424 Orli 17703424.PNG	Nov. 23, 2018	
12.	Q6B01A3EX1001	17744200	Chanel Clear Vinyl Boy 9	Chanel Red Leather Bowling Bag	CHANEL0012609 CHANEL0012610 WGACA_00029011_REDA CTED	Feb. 5, 2020	

3. Chanel reserves the right to supplement and amend the list above, as it continues to find counterfeit products being offered for sale or sold by WGACA.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed on this 4th day of December, 2020 at New York, New York.

DocuSigned by:  
*Robin Gruber*  
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Robin Gruber